

Update on Utah 179B

1. Question from Utah DAQ
2. Meetings with DAQ and UP
3. Status on final 179B Guidance
4. San Antonio 179B

Note that UDAQ is coordinating with UPA and sharing their modeling results with EPA R8.

UPA 179B Modeling

- UPA and their contractor Ramboll shared 179B modeling results with UDAQ and EPA R8 on June 4:

- Modeling based on EPA 2016 Hemispheric and CAMx 12 km platform.

- Model has negative bias of 13% on days with model O3 > 60 ppb

Ex. 5 Deliberative Process (DP)

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- CAMx results show all Wasatch sites attain when international anthropogenic emissions are zeroed out

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- **Ex. 5 Deliberative Process (DP)**

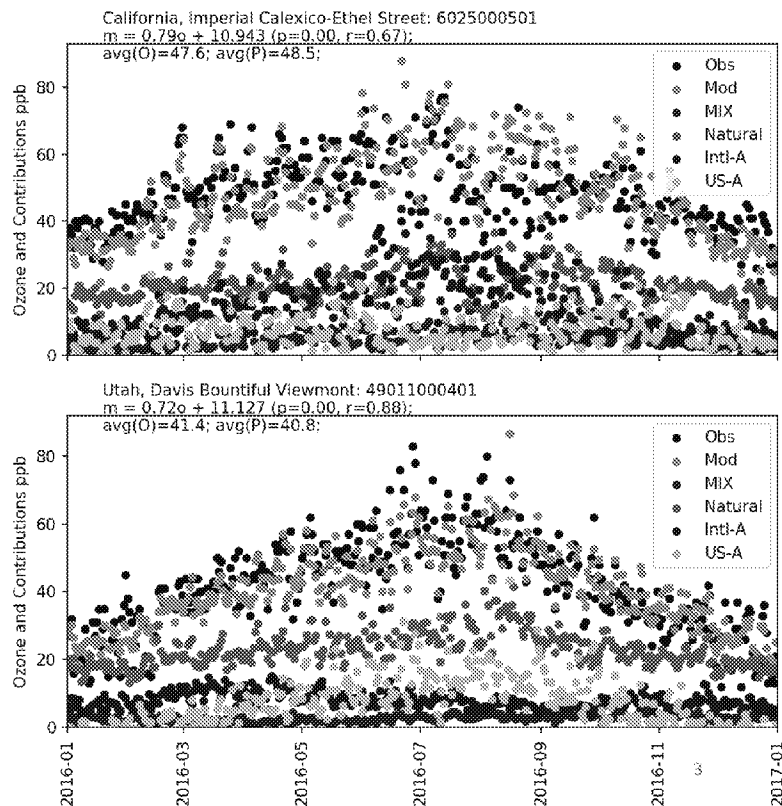
Ex. 5 Deliberative Process (DP)

We explained this on the June 4th call.

- UPA is performing additional CAMx O3 source apportionment modeling as weight of evidence.
- Next Utah/UPA call: Utah 179B Source Apportionment Data discussion @ Tue Jul 28, 2020 11am - 12:30pm (MDT)
 - We are coordinating closely with OAQPS.

EPA Modeling 2016 California vs Utah

Blue dots show larger international contributions on high ozone days in CA but lower contributions on high ozone days in UT



UDAQ questions on 179B Modeling

- If UDAQ fails to attain the 70 ppb NAAQS based on 2018-2020 data and pursues a 179B retrospective demonstration to avoid bump-up to moderate:
 - Are they required to perform meteorological and photochemical modeling for one of those three years?
 - If they model 2018, 2019, or 2020, would they need a corresponding inventory?
 - 2020 will be the next NEI inventory but it won't be completed until after the retrospective analysis is due. It would take more resources to create an off-year inventory (for 2018 or 2019).
- UDAQ is developing a 2017 platform for the SIP demonstration and would like to use 2017 instead of 2018, 2019, or 2020.
- 2020 is shaping up to be a strange year. How will EPA treat lower or higher ozone concentrations observed during this year?

Status on 179B Guidance and Precedents

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Ex. 5 Deliberative Process (DP)